UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

DATE: March 1, 1988

SUBJECT: Quality Assurance Project Plan for the Scott Air Force Base, Illinois Site

FROM: for James H. Adams, Jr., Chief
Quality Assurance Section

TO: William D. Franz, Chief
Environmental Review Branch

Attention: Claude Brogunier, P.O.

We have reviewed the subject QAPP, which we received on February 2, 1988, and found it unacceptable due to several deficiencies that must be addressed. The following specific comments must be addressed during revision of the QAPP.

I. Title Page

There is no provision for the signature of the EPA RPM and EPA QA Officer. Please correct this omission.

II. Project Description

1. There is no summary of historical data for the site. Tables may be used for this purpose. Please present a summary of historical data in this section.

2. Specific target compounds/parameters are not identified. Please do so.

3. There are no data usage statements for laboratory analyses or field measurements. All sampling parameters must have their data usages defined in this section. Please include HNU, OVA and Mercury Vapor measurements.

4. The sampling network and rationale for sampling locations are not presented in this section. Summary tables of the total number of samples for each analytical parameter or group of parameters to be

collected should be included as well as site maps or diagrams with sampling locations. Workplan references are allowed if they are specific and QAPP reviewers have access to the document.

5. There is no project time schedule, ususally included as a bar chart, in this section. Please include it.

6. The "fuel spill, fire training area and landfill" protocols for sample analyses presented in section 1.2.2 (p.1-4) are not explained in section 1.8 nor in any of the QAPP attachments. Please clarify this.

III. Project Organization and Responsibility

1. There is no mention of EPA responsibilities for project management, QAPP review, performance and systems audits by CPMS, CRL.

2. It indicates in Table 4 that at least one GC/MS method will be needed on samples for the site. Please identify the responsible party for TIC review.

3. Please clarify the responsible party for sample collection as Weston in section 1.3. It is so stated in the Laboratory QA Plan section 4.0.

IV. Quality Assurance Objectives

References to the "current IFB" should be replaced with the "current SOW."

V. Sampling Procedures

1. There is no explanation for a unique sample numbering system that includes provisions for blank and replicate samples.

2. There is no provision for the collection of extra volumes for VOC and extractrable organic MS/MSD samples. Triple the normal volume for VOCs and double the normal volume for extractable organic water samples must be collected. This applies to section 1-10 of the QAPP as well.

3. The Weston SOP on page 4-2 includes an acetone rinse during decontamination. Please correct this to methanol and air drying for equipment used for organic samples as mentioned on page 2-13 of the QAPP.

4. Cyanide preservation in Table 7, page 2-15, should be to a pH > 12.

5. It is unknown whether metals samples are to be collected filtered or unfiltered. Region V guidelines require ground water metals samples to be collected field filtered, while surface waters, residential well waters or other water samples associated with drinking water sources should be unfiltered.

VI. Sample Custody

Please include provisions for a final evidence file, describing its contents and who has the responsibility for its maintenance.

VII. Calibration Procedures and Frequency

Field calibration procedures and frequency need to be discussed for the HNU and mercury vapor monitor.

VIII. Performance and Systems Audits

CPMS, CRL has the responsibility for external systems audits for the U.S. EPA, Region V. Please make provision for this audit in section 1.11 on page 1-37 of the QAPP.

IX. Data Reduction, Validation and Reporting

1. This section has been omitted from the QAPP and confused with section 1.13, Specific Routine Procedures Used to Assess Data Precision, Accuracy and Completeness.

2. Please describe the procedures used to reduce, validate and report the data under this heading.

X. Specific Routine Procedures Used to Assess Data Precision, Accuracy and Completeness

Specify how precision, accuracy and completeness are to be assessed. Examples of this QAPP element include the use of duplicate results, spike recoveries, valid versus total expected data, etc.

IX. Preventive Maintenence

Please include HNU and field mercury monitoring device under section 1.12.2.

cc: K. Chiu, TSU